

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
PECOS DIVISION

UNITED STATES OF AMERICA

Plaintiff

V

ILANA GOLDIE LIPSEN

Defendant

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CRIM. NO. P-14-CR-337

MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW, ILANA LIPSEN, Defendant by and through her attorney of record, JAMES STAFFORD, and files this Motion to Modify Conditions of Release, and would show unto the Court the following:

I.

Ms. Lipsen is charged with violation 18 USC 922(n).

II.

On May 16, 2014, Ms. Lipsen was released on bond subject to various conditions as set forth in Order Setting Conditions of Release (Doc. 12). It is requested that condition 7(I) be amended to permit Ms. Lipsen to travel to the Southern District of Texas, namely, Houston, Texas to visit with undersigned attorney so we can prepare for trial.

III.

AUSA James Miller was contacted and he has no opposition to Ms. Lipsen traveling to Houston for legal visits.

WHEREFORE, PREMISES CONSIDERED, it is requested that Ms. Lipsen's Conditions of Release be amended to permit travel to Houston, Texas for visits with her attorney, James Stafford.

Respectfully submitted by,

/s/ JAMES STAFFORD

JAMES STAFFORD
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I, JAMES STAFFORD, hereby certify that a copy of the foregoing Motion has been forwarded to AUSA JAMES J. MILLER, JR., via the Court's electronic filing system, on this the 21st day of May, 2014.

/S/ James Stafford

JAMES STAFFORD

CERTIFICATE OF CONFERENCE

This is to certify that the undersigned counsel has consulted with the Assistant U.S. Attorney in charge of this cause in an attempt to obtain the above-requested relief.

/S/ James Stafford

JAMES STAFFORD

UNITED STATES DISTRICT COURT
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ORDER

On this the _____ day of _____, 2014, came on to be considered the
Defendant's Motion to Modify Conditions of Release, and said Motion is hereby
Granted____/Denied_____.

Signed on the date set forth above.

PRESIDING JUDGE